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U.S. Department of Justice

Environment and Natural Resources Division Po, notice Environmental Enforcement Section P.O. Box 7611

Ben Franklin Station Washington, D.C. 20044

Washington, D.C. 20530 April 15, 1992

VIA U.S. MAIL

All Counsel for Defendants

United States v. NL Industries, Inc., et al.

Civ. No. 91-578-JLF DOJ # 90-11-3-608A

Dear Counsel:

Enclosed is the United States' notice of 30(b)(6) depositions for the defendants. Please note that, due in part to the Defendants' answers to the United States' discovery, the United States does not intend to go forward with these depositions during the weeks of May 18, May 25, and June 1, 1992, until and depending on how the Court rules on the United States' Motion for a Ruling on the Appropriate Scope and Standard of Review of Agency Action and for a Protective Order Limiting the Scope of Discovery.

Also enclosed is the United States' Application to file an Oversized brief, proposed order, and certificate of service.

If you have any questions, please feel free to call me or Kevin Holewinski at (202) 514-5415.

Sincerely,

Assistant/Attorney General

Environment & Natura Resources Division

by: Léonard M. Gelman, Esq.

Environmental Enforcement Section

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Steven M. Siegel cc:

All Counsel of Record

EPA Region 5 Records Ctr.